Koch, Kristine

From: Koch, Kristine
Sent: Tuesday, March 10, 2015 11:58 AM
To: Carl Stivers
Cc: Jim McKenna (jim.mckenna@verdantllc.com); Jennifer Woronets; Amanda Shellenberger; Bob Wyatt
Subject: RE: Dioxin/Furan Follow-up
Attachments: PeCDD_Top3SDUs_2015-02-27_1358.pdf

Yes. Sorry about that. I'll be sending some new information in a little while on dioxin/furan.

Kristine Koch
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USEPA, Office of Environmental Cleanup

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From: Carl Stivers [mailto:cstivers@anchorqea.com]
Sent: Tuesday, March 10, 2015 11:36 AM
To: Koch, Kristine
Cc: Jim McKenna (jim.mckenna@verdantllc.com); Jennifer Woronets; Amanda Shellenberger; Bob Wyatt
Subject: Dioxin/Furan Follow-up

Kristine – Your email below indicates that EPA was providing a PeCDD RAL curve. It appears the curve in the pdf attached is for PeCDF. Does EPA have a PeCDD RAL curve that you can provide? Thanks very much.

Carl

Carl Stivers

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From: Koch, Kristine [mailto:Koch.Kristine@epa.gov]
Sent: Friday, March 06, 2015 2:53 PM
To: Bob Wyatt; Jim McKenna (jim.mckenna@verdantllc.com)
Cc: Jennifer Woronets; Alex Liverman (liverman.alex@deq.state.or.us); Allen, Elizabeth; Audie Huber (audiehuber@ctuir.com); Blischke, Eric; Brian Cunninghame (cunninghame@gorge.net); callie@ridolfi.com; Christopher, Anne; Coffey, Scott; Conley, Alanna; Erin Madden (erin.madden@gmail.com); Fuentes, Rene; Gabriel Moses (b) (6) Gail Fricano (gfricano@indecon.com); Genevieve Angle (Genevieve.Angle@noaa.gov); Hagerman, Paul; Holly Partridge (Holly.Partridge@grandronde.org); JD Williams (jd@williamsjohnsonlaw.com); Jeanette Mullin (mullinjm@cdmsmith.com); peterson.Jennifer@deq.state.or.us; Jeremy_Buck@fws.gov; Julie Weis (jweis@hk-law.com); Gustavson, Karl; Kristin Callahan (kristin@ridolfi.com); Matt McClincy (mcclincy.matt@deq.state.or.us); Michael.karnosh@grandronde.org; poulsen.mike@deq.state.or.us; Morrison, Kay; Muza, Richard; rdelvecchio@indecon.com DelVecchio; Rita Cabral (rcabral@indecon.com); Robert.Neely@noaa.gov; Robinson, Deborah; rose@yakamafish-nsn.gov; Sean Sheldrake; Todd King (KingTW@cdmsmith.com); tomd@ctsi.nsn.us; Tom Gainer (gainer.tom@deq.state.or.us)
Subject: Dioxin/Furan Follow-up

Jim & Bob – Here is the PeCDD RAL curve developed by CDM Smith for EPA and a map of the areas exceeding the RALs for PeCDD, PeCDF, and TCDD. As we discussed on Tuesday, our concerns with the evaluation are twofold: 1) The PRG for the dioxins are generally lower than the DL, thus the RAL/SWAC approach will map the entire site if site data are at the DL (or even a ND at the DL). We looked at the 95%ile of the ND values from the background data set, but the detection limits for the site may be greater due to interference with other contaminants. We are looking further into this issue. 2) Except in some areas of focus, the dioxin data are sparse. This lessens the reliability of the RAL/SWAC approach because RAL/remediation areas will be interpolated across large areas without data, creating a greater likelihood that results are a "false positive". Thus, the development of a range of RALs for this COC and resultant acres for remediation are limited by the data density. This will be figured out in RD, but we need to come up with a way to reasonably estimate this in the FS. We are still exploring this issue, too.

The low data density combined with the issues associated with mapping areas at the DL necessitate an alternate approach. The approach we are exploring is to define an area of greatest impact from the PeCDD and include that footprint in alternatives B through F. This approach is similar to the benthic toxicity approach and addresses the need to remediate highly contaminated areas while circumventing the misleading outcomes associated with using the RAL/SWAC approach for these COCs. However, we are considering the option of using the RALs for Alternatives B through D and then retaining the D RAL footprint as a static option for Alternatives E, F and G as suggested by Carl. In addition, we are still considering the need for RALs of 3 congeners vs. 2 congeners (a dioxin and a furan) as suggested by Carl in the meeting on Tuesday. We will convey to you early next week how we plan to proceed. We have already established a conference call for next Thursday to discuss how EPA plans to proceed.

Have a nice weekend,

Kristine Koch
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